## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF MISSISSIPPI

IN RE: Lorraine Hardy Coleman CASE NO.:15-10351-JDW

**CHAPTER 7** 

## MOTION TO REOPEN CHAPTER 7 CASE

COME NOW the debtor(s), Lorraine Hardy Coleman, and files this Motion to Reopen Chapter 7 Petition filed in the above and numbered cause and in support of said Motion would state as follows, to-wit:

- Debtor filed a petition on January 30, 2015, for relief under the Chapter 7 Bankruptcy
   Code. That Debtor(s) Chapter 7 Bankruptcy 341 Meeting of Creditors was scheduled for
   March 4, 2015.
- 2. That Debtor's Chapter 7 Bankruptcy case was discharged on May 7, 2015.
- 3. That Debtor requests that her Chapter 7 petition be reopened. The Social Security

  Administration has continued to collect on a discharged debt. They are currently

  withholding funds from the Debtor's disability claim and has refused to release the funds
  to collect on an discharged debt.
- 4. Debtor has been forced to file said Motion to Reopen to file a motion to release funds, motion to cite creditor for violation of the automatic stay and discharge injunction, motion to approve attorneys fee nunc pro tune, as well as any other necessary motion or adversary proceeding.
- 5. A case trustee may need to be appointed.

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WHEREFORE PREMISES CONSIDERED, Debtors prays that the Court would reopen their Chapter 7 petition to allow her to file a motion to release funds, motion to cite creditor for violation of the automatic stay and discharge injunction, motion to approve attorneys fee nunc pro tune, as well as any other necessary motion or adversary proceeding and any other relief that may be proper.

Respectfully submitted,

Lorraine Hardy Coleman

BY: /s/ Douglas M. Engell
DOUGLAS M. ENGELL

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## **CERTIFICATE OF SERVICE**

On March 9, 2015, a copy of this notice and motion was served on each of the persons listed on the attached service list either by United States Mail or via electronic service through the Court's CM/ECF system at the mailing addresses and/or email addresses indicated.

/S/ Douglas M. Engell
Douglas M. Engell

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Cochran U.S. Bankruptcy Courthouse

Label Matrix for local noticing 0537-1

Case 15-10351-JDW

Northern District of Mississippi

Aberdeen

Wed Mar 9 14:33:24 CST 2016

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End of Label Matrix Mailable recipients

16 Bypassed recipients

Total 16